

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In re:

DENISE R. EKSTRAND
DEBTOR

Case No:19-10964 - TPA
Judge Thomas P. Agresti

Chapter 13

Document No.

Related to Document No.

Hearing Date: February 3, 2021
at 9:30 a.m.

**DEBTORS' OBJECTION TO CLAIM NUMBER 4, NOTICE OF MORTGAGE
PAYMENT CHANGE**

AND NOW, comes Denise Ekstrand, by and through counsel, Tina M. Fryling, Esquire, and hereby files this objection to Claim Number 4, Notice of Postpetition Mortgage Fees, expenses, and Charges, and hereby represent as follows:

1. The Debtor filed a Chapter 13 bankruptcy case on September 20, 2018.
2. One of the claims filed in the case was from PNC Bank for a mortgage. The mortgage claim was to be paid in full throughout the life of the plan and, according to the Trustee's records, that claim has been paid in full.
3. PNC filed a Notice of Mortgage Payment Change on December 22, 2020, to be effective on January 17, 2021. This payment change is moot due to the claim being paid in full. PNC Bank has also sent statements to the Defendant directly indicating that a balance is due on the claim, even though the Trustee's records show otherwise.

WHEREFORE, the Debtors request that this Honorable Court deny the Payment Change requested in this claim and direct the creditor to correct its records to show payment of the claim in full.

Respectfully submitted,

By /s/ Tina M. Fryling, Esquire

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